

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA : CASE NO.: 2:21-CR-239  
Plaintiff, : JUDGE WATSON  
v. :  
KEVIN DANIELS, :  
Defendant.

**DEMAND FOR DISCOVERY**

Now comes the Defendant, Kevin Daniels, pursuant to Rule 16 of the Federal Rules of Criminal Procedure and hereby demands the government provide the following:

- (A) **Statement of Defendant.** Any relevant written or recorded statement made by the Defendant, or copies thereof, within the possession, custody, or control of the government, the existence of which is known to, or by the exercise of due diligence may become known, to the attorney for the government any relevant oral statement made by the Defendant, whether before or after arrest in response to interrogation by any person then known by the Defendant to be a government agent; and recorded testimony of the Defendant disclosure of the substance of any other relevant oral statement made by the Defendant, whether before or after arrest, in response to interrogation by any person then known by the Defendant to be a government agent if the government intends to use those statements at trial.
- (B) **Defendant's Prior Record.** Further, such copy of the Defendant's prior criminal record, if any, as is within the possession, custody, or control of the government, the existence of which is known, or by the exercise of due diligence may become known to the attorney for the government..
- (C) **Documents and Tangible Objects.** Permit inspection and copying of photograph books, papers, document, photographs, tangible objects, building or places, or copies or portions thereof, which are within the possession, custody, or control of the government, and which are material to preparation of the Defendant's defense or are intended for use by the government as evidence in chief at the trial, or were obtained from or belong to the defendant.

(D) Reports of Examinations and Tests. Permit the defendant to inspect and copy or photograph any results or reports of physical or mental examinations, and of scientific tests or experiments, or copies thereof, which are within the possession, custody, or control of the government, the existence of which is known, or by the exercise due diligence may become known, to the attorney for the government, and which are material to the preparation of the defense or are intended for use by the government as evidence in chief at the trial.

(E) Expert Witnesses. Disclose to the Defendant a written summary of testimony the government intends to use under Rule 702, 703, or 705 of the Federal Rules of Evidence during its case at the trial. The summary must describe the witnesses' opinions, the basis and the reasons therefore, and the witnesses' qualifications.

Respectfully Submitted:

/S/ Susan Pettit  
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**CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that this document was filed electronically with the Court's electronic filing system on this 4th day of January, 2022, which will send notice to all counsel of record in the above-referenced matter.

/S/ Susan Pettit  
SUSAN PETTIT (0067613)